

FILED

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SEP 12 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER MCKINNEY,

Defendant.

4:19CR748 RWS/SPM

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Edward L. Dowd, III, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g).
2. Pursuant to police reports, on June 24, 2019, officers from the St. Ann Police Department were called to the Freeman Foundation at 8499 Lackland Road in reference to an employee who was threatening management after recently being fired. Officers were informed that the subject was leaving the facility in a tan sedan. Officers spotted a tan Infinity with an expired plate. Officers stopped the vehicle at 8316 Charlack Road. Defendant McKinney stepped out of the vehicle. When asked what happened today, defendant stated, "Nothing man. They're trippin' up there and

fired me for no reason.” Defendant further stated there was a verbal argument before he left the business. Officers asked defendant if there was anything he had on him or in the vehicle that could hurt anyone. Defendant stated there was a pistol on the front passenger seat and gave consent for officers to retrieve it. In plain view on the front passenger seat was a Ruger SR 45. Defendant also had a warrant for his arrest for a failure to appear.

3. Defendant has multiple prior convictions:

4/14/2010 Burglary 2nd, 21st Jud. Cir., 5 yr. SIS, revoked 5 yrs.
11/22/2010 Burglary 1st, 21st Cir., 5 yrs.
5/1/2015 Resisting Arrest, 2nd Jud. Cir., 5 yrs.

4. Pursuant to Title 18, United States Code, Section 3142(g),

- (a) the weight of the evidence against defendant;
- (b) defendant’s criminal history and characteristics of the offense; and
- (c) the nature and seriousness of the danger to any person or the community that would be posed by defendant’s release warrant defendant’s detention pending trial.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant’s initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Edward L. Dowd, III
EDWARD L. DOWD III #61909MO
ASSISTANT UNITED STATES ATTORNEY